CORRES. CONTROL INCOMING LTR NO.

02/60RF 94

DUE DATE

ACTION

FRANZ, W.A.

HANNI, B.J.

HEALY, T.J

HEDAHL, T.G

HILBIG, J.G. HUTCHINS, N.M KELL, R.E.

KIRBY, W.A. KUESTER, A.W. MAHAFFEY, J.W

MANN, H.P

MARX, G.E.

McKENNA, F.G

MORGAN, R.V PIZZUTO, V.M.

POTTER, G.L

SANDLIN, N.B. SATTERWHITE, D.G

SCHUBERT, A.L.

WILKINSON, R.B.

KeITH S

Ledford

nudan

WILSON, J.M.

SETLOCK, G.H.

STIGER, S.G. SULLIVAN, M.T. SWANSON, E.R

DIST.
BERMAN, H.S.
CARNIVAL, G.J.
COPP, R.D.
CORDOVA, R.C.
DAVIS, J.G.
FERRERA, D.W.

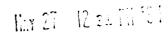


LTR ENC

Department of Energy

ROCKY FLATS OFFICE P.O. BOX 928 GOLDEN, COLORADO 80402-0928

MAY 2 6 1994



94-DOE-05912



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Mr. Gary Baughman Hazardous Waste Facilities Unit Leader Colorado Department of Health 4300 Cherry Creek Drive South Denver, Colorado 80222-1530

Dear Mr. Baughman:

This letter provides notification to the Colorado Department of Health (CDH) of a request for extension under Part 42 of the Interagency Agreement (IA) for Operable Unit No. 4 (OU 4) milestones listed on the enclosure. The request for extension is required to accommodate a proposed modification to work under Part 32 of the IA for the Phase I Interim Measure/Interim Remedial Action (IM/IRA) Decision Document (DD) to address the inclusion of the Solar Pond sludge under the 1000 year cap. This modification to work is anticipated to produce a minimum \$20 million savings to the OU 4 Program and will not compromise any of the original closure performance standards established for the action or change the start date of the remedial action construction.

Although the baseline Phase I IM/IRA DD will be submitted on May 27, 1994, it is expected that a significant portion of the DD will require modification to incorporate the expanded scope. In acknowledgment of the limited resources available to review the Phase I DD at CDH and the anticipated changes to be made to the document, it is suggested the dedication of the valuable manpower to the review of the baseline Phase I DD is not warranted until the scope change is resolved.

As discussed in a prior communication (94-DOE-05365), the Department of Energy (DOE) and EG&G have been attempting to meet with management from CDH and the Environmental Protection Agency (EPA) for the last month to discuss the proposed modification in scope to the Phase I DD and to solicit regulatory input to our plan. As you are aware, continuing schedule conflicts among the key personnel representing each participating group has necessitated postponement of the meetings. Inability or unwillingness of the parties to consider this issue in a timely manner has impacted our ability to make progress. However, DOE still desires to engage in a dialog with the regulators on the change in scope to the Phase I DD, and believe that dialog is necessary for a full understanding of the potential benefits and associated impacts.

CORRES CONTROL ADMN RECORD/080	х	х
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PATS/T130G		

Reviewed for Addressee Corres. Control RFP

5/27/94 CM DATE BY

Ref Ltr. #

DOE ORDER #5400.3

It is the opinion of DOE that the participation of the regulatory agencies as active members of the IM/IRA DD Development Team has been an extremely worthwhile and productive process. If the scope change is supported, it is suggested that the weekly meetings of the IM/IRA Development Team continue throughout the period required to modify the DD to ensure, as before, that the final document will be of the highest quality and will accurately represent to the public the combined position of all participating agencies.



If there are any questions, please contact me at 966-4538 or Frazer Lockhart at 966-7846.

Sincerely,

Jessie Roberson
Acting Assistant Manager for
Environmental Restoration

Enclosure

cc w/o Enclosure:

H. Belancan, EM-453

M. Silverman, OOM, RFFO

L. Smith, OOM RFFO F. Lockhart, ER, RFFO

S. Surovchak, PME, RFFO

S. Howard, PME, RFFO

P. Witherill, ER, RFFO

A. Duran, EPA

S. Keith, EG&G

A. Ledford, EG&G

K. London, EG&G

PROPOSED IAG MILESTONE CHANGES

	CURRENT	PROPOSED
PHASE I MILESTONE	COMMITMENT	COMMITMENT
Modified Draft Proposed phase I IM/IRA DD	5/27/94	10/26/94
Proposed Phase I IM/IRA DD	8/06/94	1/26/95
Phase I IM/IRA DD Responsiveness Summary	12/14/94	9/2/9
Final Phase I IM/IRA DD Responsiveness Summary	2/25/95	7/24/95
Submit Final IM/IRA Title II Design	2/10/95	6/21/95
All Solar Ponds emptied of water & Sludge	1/20/95	no change
Begin IM/IRA Construction	9/27/95	no change

May 25, 1994